

July 28, 2020

Via ECF

The Honorable Robert W. Lehrburger,
United States District Court for the
Southern District of New York,
500 Pearl Street,
New York, New York 10007-1312.

Re: Chen-Oster, et al. v. Goldman, Sachs & Co., et ano.,
No. 10 Civ. 6950 (AT) (RWL) (S.D.N.Y.)

Dear Judge Lehrburger:

Pursuant to Rule I.F of the Court's Individual Practices in Civil Cases, and as indicated in the parties July 27, 2020 Joint Status Report (ECF No. 1046), the parties have conferred and jointly submit a proposed revised pretrial schedule to the Court.

Respectfully submitted,

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Chen-Oster v. Goldman, Sachs & Co.
No. 10-cv-6950 (S.D.N.Y.) (Torres, J., Lehrburger, M.J.)

JOINT PROPOSED PRE-TRIAL SCHEDULE

Event	Prior Deadline(s) (ECF No. 1002)	New Deadline(s)
Fact discovery completed	August 17, 2020	November 20, 2020
Opening expert reports, with Plaintiffs going first on all issues except Goldman's business necessity defense, for which Goldman will file the first report	September 29, 2020	January 15, 2021
Rebuttal expert reports	December 3, 2020	March 19, 2021
Reply expert reports	January 15, 2021	April 19, 2021
Expert depositions	Jan. 15, 2021 – Mar. 19, 2021	April 19, 2021 – June 21, 2021
Completion of expert discovery	March 19, 2021	June 21, 2021
Opening briefs for Goldman's decert. motion, each party's summary judgment motion, and/or each party's <i>Daubert</i> motion	<i>Daubert</i> : April 9, 2021 Decert.: April 23, 2021 MSJ: May 7, 2021	<i>Daubert</i> : July 12, 2021 Decert.: July 22, 2021 MSJ: August 9, 2021
Oppositions to motions	<i>Daubert</i> : June 8, 2021 Decert.: June 22, 2021 MSJ: July 8, 2021	<i>Daubert</i> : Sept. 10, 2021 Decert.: Sept. 24, 2021 MSJ: Oct. 11, 2021
Replies in further support of motions	<i>Daubert</i> : July 8, 2021 Decert.: July 22, 2021 MSJ: August 7, 2021	<i>Daubert</i> : Oct. 8, 2021 Decert.: Oct. 25, 2021 MSJ: Nov. 8, 2021
Pretrial order and motions in limine	30 days after resolution of all <i>Daubert</i> , summary judgment and decert. motions	30 days after resolution of all <i>Daubert</i> , summary judgment and decert. motions ¹

¹ Or the next business day if the deadline falls on a weekend or a federal holiday.